

**UNITED STATES DISTRICT COURT
DISTRICT OF TEXAS
DALLAS DIVISION**

<p>LARRY HYCHE,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>EQUIFAX INFORMATION SERVICES, LLC, EXPERIAN INFORMATION SOLUTION, INC, TRANS UNION, LLC, and NATIONSTAR MORTGAGE, LLC,</p> <p style="text-align: center;">Defendants.</p>	<p style="text-align: right;">Case No. 3:19-cv-02450</p> <p style="text-align: right;">Hon. Sam. R. Cummings</p>
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**PLAINTIFF LARRY HYCHE’S RESPONSE TO
DEFENDANTS EXPERIAN INFORMATION SOLUTIONS, INC.,
EQUIFAX INFORMATION SERVICES, LLC, AND TRANS UNION, LLC.’s
JOINT MOTION TO DISMISS OR, IN THE ALTERNATIVE, STAY THE
PROCEEDINGS**

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

Plaintiff Larry Hyche (“Hyche” or “Plaintiff”), by and through counsel, files this Response to Defendants Experian Information Solutions, Inc., Equifax Information Solutions, LLC, and Trans Union, LLC.’s Motion for Judgment on the Pleadings or, in the alternative, Stay the Proceedings, and respectfully requests this Court properly deny this motion.

I.

Plaintiff Hyche incorporates by reference his *Brief in Opposition to Defendants Experian Information Solutions, Inc., Equifax Information Solutions, LLC., and Trans Union, LLC.’s Motion for Judgment on the Pleadings or, in the alternative, Stay the Proceedings* filed contemporaneously herewith pursuant to Federal Rules of Civil Procedure and Local Rule 7.1.

II.

Because Plaintiff properly pled his claims against Defendants, and further for the reasons discussed in his *Brief in Opposition to Defendant's Motion*, Plaintiff Larry Hyche respectfully requests that the Court deny Defendants' Joint Motion for Judgment on the Pleadings and grant such other and further relief, in law or equity, to which Plaintiff Hyche might show he is justly entitled.

RESPECTFULLY SUBMITTED,

FIELDS LAW FIRM

DATE: June 8, 2020

By: /s/ Matthew P. Forsberg

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SHAWN JAFFER LAW FIRM, PLLC

DATE: June 8, 2020

By: /s/ Shawn Jaffer

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Attorneys for Plaintiff Kristian Oyen

CERTIFICATE OF SERVICE

I hereby certify that on this 8TH day of June, 2020, I caused the foregoing to be electronically filed with the clerk of court for the U.S District Court for the Northern District of Texas, by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record, a true and correct copy of the foregoing instrument and all attachments.

/s/ Matthew P. Forsberg
Matthew P. Forsberg